

From: [Conlee Whiteley](#)
To: [Lockard, Victoria D. \(Shld-Atl-LT\)](#)
Cc: [rgeman@lchb.com](#); [mpatronella@classlawdc.com](#); [nmigliaccio@classlawdc.com](#); [kmadiraju@lchb.com](#); [valpec@kirtlandpackard.com](#); [David J. Stanoch](#); [DECValsartan@btlaw.com](#); [Layne Hilton](#)
Subject: [EXTERNAL]RE: Deposition date for Dr. Kaplan - Med Mon
Date: Monday, December 13, 2021 10:21:48 AM

Good Morning Victoria,

We have not held following days for the experts as no more than 7 hours will be needed for any of the experts and much less for those who have offered limited opinions. I can also update that the Panagos deposition will be in Miami. We are working to confirm all remaining dates and locations.

Thanks, Conlee

Conlee S. Whiteley
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From: lockardv@gtlaw.com <lockardv@gtlaw.com>
Sent: Friday, December 10, 2021 11:35 AM
To: Layne Hilton <l.hilton@kanner-law.com>; DECValsartan@btlaw.com
Cc: rgeman@lchb.com; mpatronella@classlawdc.com; nmigliaccio@classlawdc.com; kmadiraju@lchb.com; valpec@kirtlandpackard.com; David J. Stanoch <d.stanoch@kanner-law.com>
Subject: RE: Deposition date for Dr. Kaplan - Med Mon

We can set January 19th for Kaplan. Do you have dates for Conti?

Also can you confirm all the experts are holding the following day in case we need it?

Can you also confirm location for all?

Victoria Davis Lockard

Shareholder

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From: Layne Hilton <l.hilton@kanner-law.com>

Sent: Monday, December 6, 2021 3:01 PM

To: 'DECValsartan@btlaw.com' <DECValsartan@btlaw.com>

Cc: rgeman@lchb.com; Mark Patronella <mpatronella@classlawdc.com>;
nmigliaccio@classlawdc.com; kmadiraju@lchb.com; valpec@kirtlandpackard.com; David J. Stanoch
<d.stanoch@kanner-law.com>

Subject: [EXTERNAL]Deposition date for Dr. Kaplan - Med Mon

EXTERNAL TO GT

Counsel:

We can provide either January 19th or February 2nd for Dr. Kaplan's deposition. Please let me know whether either of these dates works for Defendants.

Thanks,

Layne

Layne Hilton

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